



March 21, 2024

Stormwater Team Leader (MC-148)
Texas Commission on Environmental Quality (TCEQ)
P.O. Box 13087
Austin, Texas 78711-3087

Re: Phase II MS4 Annual Report Transmittal for City of Keller MS4
TPDES Permit Authorization: TXR040017

Dear Team Leader-

This letter serves to deliver the required annual report for the Texas Pollutant Discharge Elimination System Small Municipal Separate Storm Sewer System General Permit, Authorization Number TXR040017 for the City of Keller MS4.

The annual report is for Year 5. The reporting period begins January 1, 2023 and ends December 31, 2023.

As required by the general permit, a copy of this submittal has also been mailed to the TCEQ Region 4, Water Section Manager in Fort Worth, Texas. If you have any questions, please contact us at (817) 743-4094 or at hesmith@cityofkeller.com

Sincerely,

Hannah E Smith
Environmental Services Specialist
City of Keller

Cc: Alonzo Liñán, Director of Public Works, City of Keller
Ryan Deal, Freese and Nichols

Phase II (Small) MS4 Annual Report Form

TPDES General Permit Number TXR040000

A. General Information

Authorization Number: TXR0400017

Reporting Year (year will be either 1, 2, 3, 4, or 5): 5

Annual Reporting Year Option Selected by MS4:

Calendar Year: X

Permit Year: _____

Fiscal Year: _____ Last day of fiscal year: (_____)

Reporting period beginning date: (month/date/year) January 1, 2023

Reporting period end date: (month/date/year) December 31, 2023

MS4 Operator Level: 2 Name of MS4: City of Keller

Contact Name: Hannah Smith Telephone Number: 817-743-4094

Mailing Address: 1100 Bear Creek Parkway Keller, TX 76248

E-mail Address: hesmith@cityofkeller.com

A copy of the annual report was submitted to the TCEQ Region: YES X NO

Region the annual report was submitted to: TCEQ Region 4 (DFW)

B. Status of Compliance with the MS4 GP and SWMP

1. Provide information on the status of complying with permit conditions:
(TXR040000 Part IV.B.2)

	Yes	No	Explain
Permittee is currently in compliance with the SWMP as submitted to and approved by the TCEQ.	X		The City is in compliance with the TCEQ-approved SWMP
Permittee is currently in compliance with recordkeeping and reporting requirements.	X		Documentation is maintained for goals that are met. Partially met goals or goals not met do not include documentation unless stated otherwise in Section 4.
Permittee meets the eligibility requirements of the permit (e.g., TMDL requirements, Edwards Aquifer limitations, compliance history, etc.).	X		The City MS4 discharges are applicable and eligible for coverage under TXR040017. Receiving surface waters are not impaired; however, the City is subject to TMDLs for bacteria and legacy pollutants via the watershed approach. Edwards Aquifer limitations are not applicable. As of 9/1/2023, the City's Compliance History classification is rated "High."
Permittee conducted an annual review of its SWMP in conjunction with preparation of the annual report	X		All BMPs were assessed by all responsible departments during the annual report preparation. It was determined each BMP is appropriate for implementation.

2. Provide a general assessment of the appropriateness of the selected BMPs. You may use the table below to meet this requirement (**see Example 1 in instructions**):

MCM(s)	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer Yes or No and explain)
1	BMP 1 Distribute Educational Material	Yes, the City distributed over 11,550 educational materials relating to stormwater during the reporting period. Distribution of educational material educates residents of potential hazards associated with illegal discharges/improper disposal of waste, and about the impact that stormwater discharges have on local waterways.
1, 2, 3	BMP 2 Stormwater Reporting By Public	Yes, the City received a total of 2 reports by public via reporting mechanism available 95% of the time during the reporting period. Public reporting allows residents to assist City staff to identify stormwater concerns and allow prompt response to the concern.
1	BMP 3 Public Involvement Opportunities	Yes, the City held 4 opportunities which included 800 participants during the reporting period. The opportunities engaged 4 target audiences. Public involvement opportunities allows educates the public and prevent potential illicit discharges before they enter the MS4.
2, 5	BMP 4 Storm Sewer System Map and Facility Inventory	Yes, 100% of the City's outfalls were mapped and an update to facility inventory and structural controls were completed by the end of the reporting period.
2	BMP 5 Illicit Discharge and Spill Inspection, Investigation, and Response	Yes, 100% of reported spills and illicit discharges were inspected within 2 business days. This reduces the discharge of pollutants from impacting local waterbodies.
2	BMP 6 OSSF Procedures	Yes, the City requests an updated OSSF inventory from the authorized agent, the Tarrant County Health Department. The City maintains an inventory that allows for prompt response in the event of failures to the authorized agent.

MCM(s)	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer Yes or No and explain)
3, 4	BMP 7 Plan Review	Yes, the City reviews 100% of construction control plans for potential water-quality impacts during construction & post-construction to reduce the discharge of pollutants to stormwater.
2, 3	BMP 8 Construction Site Inspection and Enforcement	Yes, the City conducted 3,018 inspections and issued 26 Stop work orders to implement pollution prevention measures to prevent/reduce pollutants in the stormwater.
4	BMP 9 Structural Control Maintenance, Inspection, and Enforcement	Yes, 100% of City-owned priority water quality structural controls were inspected by the end of the reporting period. Records are maintained for privately-owned structural controls.
5	BMP 10 Maintenance Contractor Oversight	Yes, the City provided oversight of contractor activities to ensure appropriate control and housekeeping measures were used, if reports were received from the public.
5	BMP 11 Municipal Operations and Maintenance Activity	Yes, the City conducts maintenance activities to reduce the discharge of pollutants from City activities.
5	BMP 12 Municipal Operations Inspection Program and Procedures	Yes, the City conducted municipal facility inspections at facilities with the potential to impact stormwater runoff in 2023.
5	BMP 13 Disposal of Collected Waste	Yes, collection and disposal of over 25,000 tons helped prevent potential pollutants from entering the stormwater system.
5	BMP 14 Street Sweeping (Roadway Pollution Prevention)	Yes, the City swept 696.8 curb miles during the reporting year. Street sweeping activities prevent debris and pollutants from entering the MS4.
2, 3, 5	BMP 15 Staff Training	Yes, staff training provides the information necessary for all applicable City staff to identify stormwater concerns in the City; therefore, reducing discharge of pollutants in stormwater. Approximately, 6 staff were trained in 2023.

MCM(s)	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer Yes or No and explain)
2, 3, 4	BMP 16 Stormwater Quality Ordinances	Yes, the City maintains ordinances that comply with illicit discharge prohibition, construction site stormwater runoff control, and post-construction permit requirements to reduce the discharge of pollutants to stormwater.

3. Describe progress towards achieving the goal of reducing the discharge of pollutants to the MEP. If no progress was made or the BMP did not result in a reduction in pollutants, provide an explanation. Use the table below to meet this requirement (**see Example 2 in instructions**):

MCM	BMP	Parameter	Quantity	Units	Does the BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)
1	BMP 1 Distribute Educational Material	Educational Material Distributed	7 3 5 4 11,550 11,300 190	Stormwater Topics Bacteria Topics Methods Audiences Stormwater Material Distributed Bacteria Material Distributed Page views	No. Though this BMP does not result in a direct reduction of pollutants, it does educate the public of hazards associated with illegal discharges/improper disposal of waste and about the impact that stormwater discharges have on local waterways.
1, 2, 3	BMP 2 Stormwater Reporting by Public	Report Submittals	2 2	Reporting mechanism Reports received	Yes. Allows for direct response to location of complaint.
1	BMP 3 Public Involvement Opportunities	Public involvement programs and events	4 4 44 890 1	Opportunities Target Audiences Adopted streets Participants Public Comment Period	Yes. Provides opportunities to the public to properly dispose of waste and educates the public of hazards associated with illegal discharges/improper disposal of waste and about the impact that stormwater discharges have on local waterways.

MCM	BMP	Parameter	Quantity	Units	Does the BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)
1	BMP 4 Storm Sewer System Map and Facility Inventory	MS4 map evaluation	374 0 9	Stormwater outfalls New Stormwater outfalls City Owned Facilities	Yes. Maintains current mapping and inventory files regarding the MS4 system for prompt response.
2	BMP 5 Illicit Discharge and Spill Inspection, Investigation, and Response	Discharge/spill response	36 21 0 6	Spill response events Discharges confirmed Spills requiring TCEQ notification Enforcement activities	Yes. Procedure to promptly address detected discharge of pollutants.
2	BMP 6 OSSF Procedures	Tarrant Co. Health Department (TCHD) Log	2,330 1 0 11 1	Known OSSFs New/Newly discovered OSSFs Known failing OSSFs referred OSSF inspections Delinquent OSSF inspection reports	Yes. OSSF complaints are referred to TCHD for inspection and correction, as needed.
3 & 4	BMP 7 Plan Review	Construction and post-construction plan reviews	15	Plans reviewed	Yes. Procedure to evaluate proper design of pollutant control systems.

MCM	BMP	Parameter	Quantity	Units	Does the BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)
2 & 3	BMP 8 Construction Site Inspection and Enforcement	Construction site enforcement	3,018	Inspection reports	Yes. Procedure to evaluate proper implementation and maintenance of construction site erosion control systems.
			26	Stop work orders	
4	BMP 9 Structural Control Maintenance, Inspection, and Enforcement	Stormwater structural controls	1	Memo of program evaluation	Yes. Procedure to evaluate the use of proper stormwater structural controls.
			160	# of priority city-owned structural controls	
			8	# of priority privately-owned structural controls	
5	BMP 10 Maintenance Contractor Oversight	Contracted maintenance activities	13	Contracts	Yes. Procedure to maintain system to prevent or minimize discharge of pollutants.
			0	Reported complaints	
5	BMP 11 Municipal Operations and Maintenance Activity	Pollution prevention activities for City operations and maintenance	0	New O&M activities identified	Yes. Procedure to maintain system to prevent or minimize discharge of pollutants.
			0	New Pollutants of Concern identified	
			24	City O&M activities	
5	BMP 12 Municipal Operations Inspection Program and Procedures	Inspection of pollution prevention measures	1	Inspections	Yes. Procedure to maintain system to prevent or minimize discharge of pollutants.
			2	Corrective Actions	

MCM	BMP	Parameter	Quantity	Units	Does the BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)
5	BMP 13 Disposal of Collected Waste	Waste removal records	3,045,508 1,366	# of opportunities for Curbside trash pickup # of opportunities for household hazardous waste pick up	Yes. Collection and proper disposal of pollutants.
5	BMP 14 Street Sweeping (Roadway Pollution Prevention)	Street sweeper	696.80	Curb miles swept	Yes. Collection and proper disposal of street and parking lot waste.
2, 3, 5	BMP 15 Staff Training	Staff training	6 12	Staff trained Training records	Yes. Educates city staff of hazards associated with illegal discharges/improper disposal of waste and about the impact that stormwater discharges have on local waterways.

4. Provide the measurable goals for each of the MCMs, and an evaluation of the success of the implementation of the measurable goals (**see Example 3 in instructions**):

MCM(s)	Measurable Goal(s)	<p>Explain progress toward goal or how goal was achieved. If goal was not accomplished, please explain.</p>
<p>MCM 1 BMP 1 Distribute Educational Material</p>	<p>A. Distribute educational material about stormwater pollution prevention and the hazards associated with illegal discharges and improper disposal of waste by <u>December of each year</u>.</p> <ul style="list-style-type: none"> i. Develop and distribute educational material for <u>at least 3 stormwater pollution prevention topics</u>. ii. <u>Utilize at least 3 methods of distribution</u>. iii. <u>Reach at least 3 target audiences</u>. <p>B. <i>Targeted BMP for Bacteria: Provide <u>at least 2 topics of educational materials specific to reduction of bacteria by December of each year</u>.</i></p>	<p>Exceeded goal. The City developed and distributed 7 stormwater topics, with 3 of those topics targeted for bacteria. The City used 5 methods of distribution. Educational material was developed to reach 4 target audiences.</p>
<p>MCM 1, 2, 3 BMP 2 Stormwater Reporting by Public</p>	<p>A. Facilitate public reporting of stormwater quality concerns and illicit discharges.</p> <ul style="list-style-type: none"> i. Maintain <u>at least 1 mechanism</u> for the public to submit stormwater quality reports. ii. Ensure the stormwater reporting mechanism is publicly accessible <u>at least 95%</u> of the time. iii. Respond to stormwater quality reports <u>within 2 business days</u>; if the public report concerns an immediate threat to human health or the environment, respond <u>within 24 hours</u> of notification. iv. <i>Targeted BMP for Bacteria: Respond to stormwater quality reports specific to bacteria reduction (e.g. SSO's) <u>within 1 business day</u>.</i> 	<p>Met goal. The City utilized 2 mechanisms that are available 95% of the time to receive notifications. Stormwater quality reports are responded to within 2 business days.</p>

MCM(s)	Measurable Goal(s)	Explain progress toward goal or how goal was achieved. If goal was not accomplished, please explain.
<p>MCM 1 BMP 3 Public Involvement Opportunities</p>	<p>A. Facilitate public involvement and education for stormwater pollution prevention activities by <u>December of each year</u>.</p> <ul style="list-style-type: none"> i. Provide <u>at least 3 public involvement opportunities</u> for stormwater pollution prevention. ii. Engage <u>at least 2 target audiences</u>. <p>B. Consider and facilitate public input in the implementation of the program.</p> <ul style="list-style-type: none"> i. Provide <u>one opportunity</u> for public to provide feedback on the SWMP during the public comment period. 	<p>Exceeded goal. The City offered 4 opportunities for public involvement and engaged at least 4 target audiences.</p> <p>Public input on the SWMP began December 22, 2023. The City received the TCEQ NOI renewal certificate January 24, 2024.</p>
<p>MCM 2 & 5 BMP 4 Storm Sewer System Map and Facility Inventory</p>	<p>A. Map <u>100%</u> of the City's new stormwater outfalls discharging to Waters of the U.S. <u>within 12 months</u> of identification or notification of installation.</p> <p>B. Review MS4 map and update inventory of facilities and structural controls and priority areas <u>by December of each year</u>.</p>	<p>Met goal. The City evaluated the MS4 system to identify new outfalls. No new outfalls were identified during the evaluation.</p>

MCM(s)	Measurable Goal(s)	Explain progress toward goal or how goal was achieved. If goal was not accomplished, please explain.
<p>MCM 2 BMP 5 Illicit Discharge Prohibition/ Elimination Ordinance</p>	<p>A. Continue a program to inspect, investigate, and respond to notifications of spills and illicit discharges and eliminate identified sources of illicit discharge.</p> <p>i. Respond to <u>100%</u> of notifications of spills and illicit discharge with inspections <u>within 2 business days</u> of receiving a notification; if the notification concerns an immediate threat to human health or the environment, respond <u>within 24 hours</u> of notification.</p> <p>ii. Notify TCEQ of 100% of spills and illicit discharges that are believed to be an immediate threat to human health or the environment <u>within 24 hours</u> of identification.</p> <p>iii. <i>Targeted BMP for Bacteria: Conduct inspections and maintenance of sanitary sewer system and record <u>at least 95%</u> of inspection and maintenance work orders by <u>December of each year.</u></i></p>	<p>Met goal. The City responded to 36 IDDE notifications of spills, illicit discharges, and illegal dumping notifications. None of the notifications required notification to TCEQ.</p> <p>Sanitary sewer inspections and maintenance are documented using the City's work order system. This system stores 95% of the work orders for the sanitary sewer system.</p>
<p>MCM 2 BMP 6 OSSF Procedures</p>	<p>A. <i>Maintain <u>one copy</u> of inventory of known OSSF within the MS4 area.</i></p> <p>B. <i>Refer <u>100% of known</u> reports of failing on-site septic facilities to jurisdictional authority.</i></p> <p>C. <i>Request <u>one copy</u> of the OSSF inspection reports from jurisdictional authority <u>by December of each year.</u></i></p>	<p>Met goal. The City maintains an inventory of known OSSFs. One OSSF complaint was reported to the jurisdictional authority, Tarrant County Health Department, and resolved.</p>

MCM(s)	Measurable Goal(s)	Explain progress toward goal or how goal was achieved. If goal was not accomplished, please explain.
<p>MCM 3 & 4 BMP 7 Plan Review</p>	<p>A. Conduct engineering and construction plan reviews of site development and redevelopment projects to the standards set forth in City ordinances and design criteria to evaluate potential water quality impacts during construction and post-construction.</p> <ul style="list-style-type: none"> i. Review <u>100%</u> of plans submitted to the City prior to final acceptance of plans. ii. Maintain <u>one copy</u> of final plan review documentation for <u>100%</u> of approved construction plans. 	<p>Met goal. The City reviewed 100% of plans submitted and maintains a copy for records. A total of 15 plans were reviewed in 2023.</p>
<p>MCM 2 & 3 BMP 8 Construction Site Inspection and Enforcement</p>	<p>A. Conduct inspections of priority construction sites (e.g. site size, contractor performance history, sensitivity of receiving waters) within the MS4 according to City procedures and ordinances.</p> <ul style="list-style-type: none"> i. Conduct <u>at least one site inspection of 100%</u> of identified active priority construction sites, including evaluation of coverage under the Construction General Permit (TXR150000). ii. Maintain <u>one copy</u> of each completed construction site inspection report. <p>B. Enforce correction by violators of City ordinance governing construction site operations and TPDES Construction General Permit TXR150000.</p> <ul style="list-style-type: none"> i. Conduct follow-up action (i.e. inspection or enforcement) for <u>100% of sites</u> with observed violations <u>within 10 business days</u>. 	<p>Met goal. The City conducted 3,018 construction stormwater inspections and maintained copies of each. A total of 26 stop work orders were issued.</p>

MCM(s)	Measurable Goal(s)	Explain progress toward goal or how goal was achieved. If goal was not accomplished, please explain.
<p>MCM 4 BMP 9 Structural Control Maintenance, Inspection, and Enforcement</p>	<p>A. Continue inspections of City-owned priority water quality structural controls according to written procedures.</p> <p>i. Inspect <u>100%</u> of City-owned priority water quality structural controls <u>by the end of the permit term</u>.</p> <p>B. Continue and/or implement requirements for deed-recorded maintenance plans for privately-owned structural controls.</p> <p>ii. Record <u>100%</u> of maintenance agreements for new privately-owned post-construction BMPs prior to final acceptance.</p> <p>iii. Document enforcement action for post-construction requirements at privately-owned post-construction BMPs <u>by December of each year</u>.</p>	<p>Met goal. The City inspected 160 City-owned structural controls, and 8 privately-owned structural controls, with records of inspections maintained. Enforcement action is recorded and maintained for documentation.</p>
<p>MCM 5 BMP 10 Maintenance Contractor Oversight</p>	<p>A. Utilize standard contract language requiring compliance with City stormwater pollution prevention measures, good housekeeping practices, and facility specific stormwater management operating procedures on <u>100%</u> of new or renewed service agreements with contractors hired to perform City maintenance activities with the potential to impact stormwater quality.</p> <p>B. Investigate stormwater quality reports concerning contracted maintenance activities <u>within 2 business days</u> of receipt of report.</p> <p>i. Maintain <u>one copy</u> of inspection documentation notes and follow-up actions, as necessary.</p>	<p>Met goal. The City incorporated standard contract language requiring City contractors to conduct work in accordance with City ordinances. Zero contractor reports or contractor stormwater enforcements were needed.</p>

MCM(s)	Measurable Goal(s)	Explain progress toward goal or how goal was achieved. If goal was not accomplished, please explain.
<p>MCM 5 BMP 11 Municipal Operations and Maintenance Activity</p>	<p>A. Continue to perform existing operations and maintenance activities according to established procedures to reduce the discharge of pollutants from the activities.</p> <p>B. Implement a set of pollution prevention measures for any newly identified operations and maintenance activities with potential to impact stormwater quality performed by the City <u>within 12 months</u> of identification of the activity.</p>	<p>Met goal. The City continued to perform existing operations and maintenance activities. Pollution prevention measures are added within 12 months of the identification of new municipal operation and maintenance activity. No new activities with potential to impact stormwater were identified in 2023.</p>
<p>MCM 5 BMP 12 Municipal Operations Inspection Program and Procedures</p>	<p>A. Begin visual inspection of pollution prevention measures at City-owned facilities according to written procedures.</p> <p>i. Inspect <u>100%</u> of pollution prevention measures <u>by the end of the permit term</u>.</p> <p>ii. Maintain <u>one completed inspection checklist</u> for each facility.</p>	<p>Met goal. The City conducted one inspection of City-owned facilities with the potential to impact stormwater runoff. Two corrective actions were taken.</p>
<p>MCM 5 BMP 13 Disposal of Collected Waste</p>	<p>A. Dispose of waste material in accordance with Title 30 of Texas Administrative Code Chapters 330 or 335, as applicable.</p> <p>i. Maintain <u>one copy</u> of associated waste disposal documentation (e.g. waste manifests, contractor invoices, etc.) and estimate the amount of waste material disposed of by <u>December of each year</u>.</p>	<p>Met goal. The City maintains a contract with CWD for waste disposal and maintains records of disposal manifests.</p>
<p>MCM 5 BMP 14 Street Sweeping (Roadway Pollution Prevention)</p>	<p>A. Conduct street sweeping activities for City-owned roadways and parking lots according to established procedures.</p> <p>i. Maintain a schedule/log of sweeper activity; <u>record 100% of entries by December of each year</u>.</p>	<p>Met goal. The City swept 696.8 lane miles and removed 420 cubic yards of debris from the streets.</p>

MCM(s)	Measurable Goal(s)	Explain progress toward goal or how goal was achieved. If goal was not accomplished, please explain.
MCM 2, 3, & 5 BMP 15 Staff Training	<p>A. Conduct training for staff with responsibilities relating to activities with potential impacts to stormwater quality.</p> <ul style="list-style-type: none"> i. Provide general awareness-level training for pollution prevention and good housekeeping to staff <u>at least once annually</u>. ii. Provide job-specific stormwater quality and pollution prevention training to <u>100% of staff responsible</u> for performing those activities <u>in advance of conducting unsupervised responsibilities</u>. iii. Provide job-specific stormwater quality and pollution prevention training to 100% of staff responsible for performing those activities <u>within 12 months of date of hire or transfer to new role</u>. iv. Maintain <u>one copy</u> of training documentation onsite or in SWMP <u>by December of each year</u>. 	Partially met goal. Due to staff turnover, general stormwater awareness training was unable to be completed for City staff in 2023. However, six members of staff who perform or inspect activities that have the potential to impact stormwater runoff completed or maintain 12 job-specific training certifications in 2023 collectively.
MCM 2, 3, & 4 BMP 16 Stormwater Quality Ordinances	<p>A. Document any changes to existing City ordinances to comply with illicit discharge prohibition, construction site stormwater runoff control, and post-construction permit requirements in one memo to file <u>by December</u>.</p>	Met goal. The City did not have any updates to the ordinances.

C. Stormwater Data Summary

Provide a summary of all information used, including any lab results (if sampling was conducted) to assess the success of the SWMP at reducing the discharge of pollutants to the MEP. For example, did the MS4 conduct visual inspections, clean the inlets, look for illicit discharge, clean streets, look for flow during dry weather, etc.?

BMP	Activity	Number/ Frequency	Units	Success at Reducing Pollutants
BMP 3 Public Involvement Opportunities	Public involvement programs and events	241	Bags of trash collected	Public involvement opportunities allow for residents and contractors to properly dispose of household hazardous waste and debris.
BMP 11 Municipal Operations and Maintenance Activity	Pollution Prevention Activities	24	Total maintenance activities conducted	Maintenance of the sanitary sewer system, storm sewer system, and fleet vehicles removes and/or prevents potential pollutants from the City MS4 and reduces the chance for sanitary sewer overflows as the result of blocked sanitary sewer system.
		1	Sanitary Sewer Overflows	
		804	Sanitary Sewer Work Orders	
		268,606	Linear Feet Cleaned	
		23,960	Linear Feet Inspected	
BMP 13 Disposal of Collected Waste	Waste Disposal Documentation	25,021	Tons of waste collected	Proper disposal of municipal waste and debris collected throughout the year. Prevents the introduction of waste and debris into the MS4.
BMP 14 Street Sweeping	Street Sweeper	420	Cubic yds. of debris collected	Street sweeping helps reduce the volume of pollutants entering the City MS4. This prevents pollutants from entering surface waters and helps maintain the MS4s effectiveness.

D. Impaired Waterbodies

1. Identify whether an impaired water within the permitted area was added to the latest EPA-approved 303(d) list or the Texas Integrated Report of Surface Water Quality for CWA Sections 305(b) and 303(d). List any newly-identified impaired waters below by including the name of the water body and the cause of impairment.

No waterbodies within the permitted area were added to the 2022 Texas Integrated Report Index of Water Quality Impairments.

2. If applicable, explain below any activities taken to address the discharge to impaired waterbodies, including any sampling results and a summary of the small MS4's BMPs used to address the pollutant of concern.

Bear Creek (Segment 0841B) - Bacteria

Lower West Fork Trinity River (Segment 0841) – Bacteria

MCM(s)	Focused BMPs for Bacteria	Permit Year 5 Stormwater Activities
1	BMP 1 Distribute Educational Material	<i>Targeted BMP for Bacteria: Provide <u>at least 2 topics</u> of educational materials specific to reduction of bacteria by <u>December of each year.</u></i>
1, 2, & 3	BMP 2 Stormwater Reporting by Public	A. Facilitate public reporting of stormwater quality concerns and illicit discharges. i. <i>Targeted BMP for Bacteria: Respond to stormwater quality reports specific to bacteria reduction (e.g. SSO's) <u>within 1 business day.</u></i>
2	BMP 5 Illicit Discharge and Spill Inspection, Investigation, and Response	A. Continue a program to inspect, investigate, and respond to notifications of spills and illicit discharges and eliminate identified sources of illicit discharge. i. <i>Targeted BMP for Bacteria: Conduct inspections and maintenance of sanitary sewer system and record <u>at least 95% of inspection and maintenance work orders by December of each year.</u></i>
2	BMP 6 OSSF Procedures	A. <i>Maintain <u>one copy</u> of inventory of known OSSF within the MS4 area.</i> B. <i>Refer <u>100% of known</u> reports of failing on-site septic facilities to jurisdictional authority.</i> C. <i>Request <u>one copy</u> of the OSSF inspection reports from jurisdictional authority <u>by December of each year.</u></i>

3. Describe the implementation of targeted controls if the small MS4 discharges to an impaired water body with an approved TMDL.

The City discharges stormwater to Bear Creek and the Lower West Fork Trinity River indirectly. However, Bear Creek and the Lower West Fork Trinity River are subject to a TMDL for bacteria. Therefore, the City's targeted controls for reducing bacteria are residential areas and sanitary sewer system protections. The four focused BMPs have been selected to focus on these two targeted areas of control.

4. Report the benchmark identified by the MS4 and assessment activities:

Benchmark Parameter (Ex: Total Suspended Solids)	Benchmark Value	Description of additional sampling or other assessment activities	Year(s) conducted
Bacteria	1,085 Billion MPN/day for Bear Creek (Segment 0841B)	No additional sampling	N/A

5. Provide an analysis of how the selected BMPs will be effective in contributing to achieving the benchmark:

Benchmark Parameter	Selected BMP	Contribution to achieving Benchmark
Bacteria	BMP 1 Distribute Educational Material	Education about best practices
Bacteria	BMP 2 Stormwater Reporting by Public	Prompt reporting of discharges for rapid response
Bacteria	BMP 5 Illicit Discharge and Spill Inspection, Investigation, and Response	Procedures to minimize discharge of pollutants
Bacteria	BMP 6 OSSF Procedures	Practices to prevent or minimize system failures that would result in discharge of pollutants

6. If applicable, report on focused BMPs to address impairment for bacteria:

Description of bacteria-focused BMP	Comments/Discussion
BMP 1 Distribute Educational Material	Education about best practices
BMP 2 Stormwater Reporting by Public	Prompt reporting of discharges for rapid response
BMP 5 Illicit Discharge and Spill Inspection, Investigation, and Response	Procedures to minimize discharge of pollutants
BMP 6 OSSF Procedures	Practices to prevent or minimize system failures that would result in discharge of pollutants

7. Assess the progress to determine BMP's effectiveness in achieving the benchmark.

For example, the MS4 may use the following benchmark indicators:

- number of sources identified or eliminated;
- number of illegal dumpings;
- increase in illegal dumping reported;
- number of educational opportunities conducted;
- reductions in sanitary sewer flows (SSOs); /or
- increase in illegal discharge detection through dry screening.

Benchmark Indicator	Description/Comments
Number of sources identified or eliminated	There were 241 bags of trash collected through volunteer and routine street/parks cleanup activities; 25,021 tons of waste material collected from residents; There were 804 sanitary sewer work orders for line inspections and maintenance conducted; 268,606 feet of sanitary sewer system cleaned, and 23,960 feet of sanitary sewer system inspected.
Reduction in illegal discharges	Out of 36 illicit discharges responded to, there were only 21 illicit discharges confirmed.

Benchmark Indicator	Description/Comments
Number of educational opportunities conducted	<p>A total of 11,300 bacteria related educational materials were distributed. The material distributed addressed the following:</p> <ul style="list-style-type: none"> -Bacteria discharging from a residential site either during storm runoff events or directly -Fats, oils, and grease (FOG) clogging sanitary sewer lines and causing overflows -Non-flushable wipes clogging sanitary sewer lines and causing overflows -Pet waste and bacteria -Yard waste/fertilizers <p>A total of two (2) links are accessible on the City’s stormwater web page. The stormwater web page was updated and is available for public view. In 2023 the stormwater web page received a total of 190 web page views.</p>
Reductions in sanitary sewer overflows (SSOs)	<p>There was one (1) sanitary sewer overflow (SSOs) during the reporting period. The City continues its efforts to improve sanitary sewer operation by conducting routine maintenance and inspections of sewer lines. A total of 200 educational materials were distributed to residents and food establishments with a list of best management practices (BMPs) for reduction of SSOs resulting from FOG and non-flushable wipes build up in sanitary sewer lines.</p>

E. Stormwater Activities

Due to the delay in the Texas NeT-MS4 System set-up, the renewal of the Phase II MS4 General Permit has been delayed until August 2024. Small MS4 operators with active authorizations were granted administrative continuance of their existing authorization until the renewal permit is issued in August 2024. The City will continue Year 5 activities until new authorizations are issued under the issuance of the 2024 Phase II Small MS4 General Permit.

Describe activities planned for the next reporting year:

MCM(s)	BMP	Stormwater Activity	Description/Comments
1	1	Distribute Education Material	<p><u>Permit Year 5 Continuance:</u></p> <p>A. Distribute educational material about stormwater pollution prevention and the hazards associated with illegal discharges and improper disposal of waste by <u>December of each year</u>.</p> <ul style="list-style-type: none"> i. Develop and distribute educational material for <u>at least 3 stormwater pollution prevention topics</u>. ii. <u>Utilize at least 3 methods of distribution</u>. iii. <u>Reach at least 3 target audiences</u>. <p>B. <i>Targeted BMP for Bacteria: Provide <u>at least 2 topics of educational materials specific to reduction of bacteria by December of each year</u>.</i></p>

MCM(s)	BMP	Stormwater Activity	Description/Comments
1,2, & 3	2	Stormwater Reporting by Public	<p><u>Permit Year 5 Continuance:</u></p> <p>A. Facilitate public reporting of stormwater quality concerns and illicit discharges.</p> <ul style="list-style-type: none"> i. Maintain <u>at least 1 mechanism</u> for the public to submit stormwater quality reports. ii. Ensure the stormwater reporting mechanism is publicly accessible <u>at least 95%</u> of the time. iii. Respond to stormwater quality reports <u>within 2 business days</u>; if the public report concerns an immediate threat to human health or the environment, respond <u>within 24 hours</u> of notification. iv. <i>Targeted BMP for Bacteria: Respond to stormwater quality reports specific to bacteria reduction (e.g. SSO's) <u>within 1 business day.</u></i>
1	3	Public Involvement Opportunities	<p><u>Permit Year 5 Continuance:</u></p> <p>A. Facilitate public involvement and education for stormwater pollution prevention activities <u>by December of each year.</u></p> <ul style="list-style-type: none"> i. Provide <u>at least 3 public involvement opportunities</u> for stormwater pollution prevention. ii. Engage <u>at least 2 target audiences.</u>
2 & 5	4	Storm Sewer System Map and Facility Inventory	<p><u>Permit Year 5 Continuance:</u></p> <p>A. Map <u>100%</u> of the City's new stormwater outfalls discharging to Waters of the U.S. <u>within 12 months</u> of identification or notification of installation.</p> <p>B. Review MS4 map and update inventory of facilities and structural controls by <u>December of each year.</u></p>

MCM(s)	BMP	Stormwater Activity	Description/Comments
2	5	Illicit Discharge and Spill Inspection, Investigation, and Response	<p><u>Permit Year 5 Continuance:</u></p> <p>A. Continue a program to inspect, investigate, and respond to notifications of spills and illicit discharges and eliminate identified sources of illicit discharge.</p> <p>i. Respond to <u>100%</u> of notifications of spills and illicit discharge with inspections <u>within 2 business days</u> of receiving a notification; if the notification concerns an immediate threat to human health or the environment, respond <u>within 24 hours</u> of notification.</p> <p>ii. Notify TCEQ of <u>100%</u> of spills and illicit discharges that are believed to be an immediate threat to human health or the environment <u>within 24 hours</u> of identification.</p> <p>iii. <i>Targeted BMP for Bacteria: Conduct inspections and maintenance of sanitary sewer system and record <u>at least 95%</u> of inspection and maintenance work orders by <u>December of each year.</u></i></p>
2	6	OSSF Procedures	<p><u>Permit Year 5 Continuance:</u></p> <p>A. Maintain <u>one copy</u> of inventory of known OSSF within the MS4 area.</p> <p>B. Refer <u>100% of known</u> reports of failing on-site septic facilities to jurisdictional authority.</p> <p>C. Request <u>one copy</u> of the OSSF inspection reports from jurisdictional authority <u>by December of each year.</u></p>
3 & 4	7	Plan Review	<p><u>Permit Year 5 Continuance:</u></p> <p>A. Conduct engineering and construction plan reviews of site development and redevelopment projects to the standards set forth in City ordinances and design criteria to evaluate potential water quality impacts during construction and post-construction.</p> <p>i. Review <u>100%</u> of plans submitted to the City prior to final acceptance of plans.</p> <p>ii. Maintain <u>one copy</u> of final plan review documentation for <u>100%</u> of approved construction plans.</p>

MCM(s)	BMP	Stormwater Activity	Description/Comments
2 & 3	8	Construction Site Inspection and Enforcement	<p><u>Permit Year 5 Continuance:</u></p> <p>A. Conduct inspections of priority construction sites (e.g. site size, contractor performance history, sensitivity of receiving waters) within the MS4 according to City procedures and ordinances.</p> <p>i. Conduct <u>at least one site inspection of 100%</u> of identified active priority construction sites, including evaluation of coverage under the Construction General Permit (TXR0150000).</p> <p>ii. Maintain <u>one copy</u> of each completed construction site inspection report.</p> <p>B. Enforce correction of violations of City ordinance provisions governing construction site operations and TPDES Construction General Permit TXR150000.</p> <p>i. Conduct follow-up action (i.e. inspection or enforcement) for <u>100% of sites</u> with observed violations <u>within 10 business days</u>.</p>
4	9	Structural Control Maintenance, Inspection, and Enforcement	<p><u>Permit Year 5 Continuance:</u></p> <p>A. Continue inspections of City-owned priority water quality structural controls according to written procedures.</p> <p>i. Inspect <u>100%</u> of City-owned priority water quality structural controls <u>by the end of the permit term</u>.</p> <p>B. Continue and/or implement requirements for deed-recorded maintenance plans for privately-owned structural controls.</p> <p>i. Record <u>100%</u> of maintenance agreements for new privately-owned post-construction BMPs prior to final acceptance.</p> <p>ii. Document enforcement action for post-construction requirements at privately-owned post-construction BMPs <u>by December of each year</u>.</p>

MCM(s)	BMP	Stormwater Activity	Description/Comments
5	10	Maintenance Contractor Oversight	<p><u>Permit Year 5 Continuance:</u></p> <p>A. Utilize standard contract language requiring compliance with City stormwater pollution prevention measures, good housekeeping practices, and facility specific stormwater management operating procedures on <u>100%</u> of new or renewed service agreements with contractors hired to perform City maintenance activities with the potential to impact stormwater quality.</p> <p>B. Investigate stormwater quality reports concerning contracted maintenance activities <u>within 2 business days</u> of receipt of report.</p> <p>i. Maintain <u>one copy</u> of inspection documentation notes and follow-up actions, as necessary.</p>
5	11	Municipal Operations and Maintenance Activity	<p><u>Permit Year 5 Continuance:</u></p> <p>A. Continue to perform existing operations and maintenance activities according to established procedures to reduce the discharge of pollutants from the activities.</p> <p>B. Implement a set of pollution prevention measures for any newly identified operations and maintenance activities with potential to impact stormwater quality performed by the City <u>within 12 months</u> of identification of the activity.</p>
5	12	Municipal Operations Inspection Program and Procedures	<p><u>Permit Year 5 Continuance:</u></p> <p>A. Begin visual inspection of pollution prevention measures at City-owned facilities according to written procedures.</p> <p>i. Inspect <u>100%</u> of pollution prevention measures <u>by the end of the permit term</u>.</p> <p>ii. Maintain <u>one completed inspection checklist</u> for each facility.</p>

MCM(s)	BMP	Stormwater Activity	Description / Comments
5	13	Disposal of Collected Waste	<p><u>Permit Year 5 Continuance:</u></p> <p>A. Dispose of waste material in accordance with Title 30 of Texas Administrative Code Chapters 330 or 335, as applicable.</p> <p>i. Maintain <u>one copy</u> of associated waste disposal documentation (e.g. waste manifests, contractor invoices, etc.) and estimate the amount of waste material disposed of by <u>December of each year</u>.</p>
5	14	Street Sweeping (Roadway Pollution Prevention)	<p><u>Permit Year 5 Continuance:</u></p> <p>A. Conduct street sweeping activities for City-owned roadways and parking lots according to established procedures.</p> <p>i. Maintain a schedule/log of sweeper activity; <u>record 100% of entries by December of each year</u>.</p>
2,3, & 5	15	Staff Training	<p><u>Permit Year 5 Continuance:</u></p> <p>A. Conduct training for staff with responsibilities relating to activities with potential impacts to stormwater quality.</p> <p>i. Provide general awareness-level training for pollution prevention and good housekeeping to staff <u>at least once annually</u>.</p> <p>ii. Provide job-specific stormwater quality and pollution prevention training to <u>100% of staff responsible</u> for performing those activities <u>in advance of conducting unsupervised responsibilities</u>.</p> <p>iii. Provide job-specific stormwater quality and pollution prevention training to <u>100% of staff responsible</u> for performing those activities <u>within 12 months of date of hire or transfer to new role</u>.</p> <p>iv. Maintain <u>one copy</u> of training documentation onsite or in SWMP by <u>December of each year</u>.</p>

MCM(s)	BMP	Stormwater Activity	Description/Comments
2,3, & 4	16	Stormwater Quality Ordinances	<p><u>Permit Year 5 Continuance:</u></p> <p>A. Document any changes to existing City ordinances to comply with illicit discharge prohibition, construction site stormwater runoff control, and post-construction permit requirements in a memo to file <u>by December of each year.</u></p>

F. SWMP Modifications

1. The SWMP and MCM implementation procedures are reviewed each year.

Yes No

2. Changes have been made or are proposed to the SWMP since the NOI or the last annual report, including changes in response to TCEQ's review.

Yes No

If "Yes," report on changes made to measurable goals and BMPs:

MCM(s)	Measurable Goal(s) or BMP(s)	Implemented or Proposed Changes (Submit NOC as needed)
N/A	N/A	N/A

Note: If changes include additions or substitutions of BMPs, include a written analysis explaining why the original BMP is ineffective or not feasible, and why the replacement BMP is expected to achieve the goals of the original BMP.

3. Explain additional changes or proposed changes not previously mentioned (i.e. dates, contacts, procedures, annexation of land, etc.).

N/A

G. Additional BMPs for TMDLs and I-Plans

Provide a description and schedule for implementation of additional BMPs that may be necessary, based on monitoring results, to ensure compliance with applicable TMDLs and implementation plans.

BMP	Description	Implementation Schedule (start date, etc.)	Status/Completion Date (completed, in progress, not started)
N/A	N/A	N/A	N/A

H. Additional Information

1. Is the permittee relying on another entity to satisfy any permit obligations?

___ Yes No

If "Yes," provide the name(s) of other entities and an explanation of their responsibilities (add more spaces or pages if needed): **N/A**

2.a. Is the permittee part of a group sharing a SWMP with other entities?

___ Yes No

2.b. If "yes," is this a system-wide annual report including information for all permittees? **N/A**

If "Yes," list all associated authorization numbers, permittee names, and SWMP responsibilities of each member (add additional spaces or pages if needed):

Authorization Number: **N/A** Permittee: **N/A**

I. Construction Activities

1. The number of construction activities that occurred in the jurisdictional area of the MS4 (Large and Small Site Notices submitted by construction site operators):

 4

2a. Does the permittee utilize the optional seventh MCM related to construction?

___ Yes No

2b. If "yes," then provide the following information for this permit year:

The number of municipal construction activities authorized under this general permit	N/A
The total number of acres disturbed for municipal construction projects	N/A

Note: Though the seventh MCM is optional, implementation must be requested on the NOI or on a NOC and approved by the TCEQ.

J. Certification

If this is this a system-wide annual report including information for all permittees, each permittee shall sign and certify the annual report in accordance with 30 TAC §305.128 (relating to Signatories to Reports).

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name (printed): Alonzo Liñán Title: Director of Public Works

Signature:  Date: 3-25-24

Name of MS4 City of Keller MS4

If you have questions on how to fill out this form or about the Stormwater Permitting program, please contact us at 512-239-4671.

Individuals are entitled to request and review their personal information that the agency gathers on its forms. They may also have any errors in their information corrected. To review such information, contact us at 512-239-3282.